

THE HONORABLE JOHN H. CHUN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

NORTHWEST ADMINISTRATORS, INC.,

Plaintiff,

v.

DHL EXPRESS (USA), INC., an Ohio  
corporation,

Defendant.

Case No. 2:23-cv-01430-JHC

**SECOND STIPULATION AND  
ORDER EXTENDING  
DEFENDANT'S DEADLINE TO  
ANSWER OR RESPOND TO  
COMPLAINT**

NOTE ON MOTION CALENDAR:  
October 31, 2023

**STIPULATION**

Defendant DHL Express (USA), Inc. and Plaintiff Northwest Administrators, Inc. hereby STIPULATE AND AGREE to a second extension for Defendant to answer or otherwise respond to the Complaint to November 15, 2023.

On September 20, 2023, Plaintiff served the Complaint on Defendant. On October 10, 2023, the parties agreed to, and the Court granted, an extension for Defendant's Answer or other responsive pleading to November 1, 2023. Dkts. 6, 7. While the parties have since made a good faith effort to confer, investigate, and resolve the benefits contribution issues in this lawsuit, more time is needed to fully assess the claims in this lawsuit. Accordingly, the parties stipulate and agree, subject to the approval of the Court, that good cause exists to further extend Defendant's

SECOND STIPULATION AND ORDER  
EXTENDING DEFENDANT'S DEADLINE  
TO ANSWER OR RESPOND TO  
COMPLAINT - 1

(Case No. 2:23-cv-01430-JHC)

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1 Answer or other responsive pleading to November 15, 2023.

2 This stipulation and order shall not operate as an admission of any factual allegation or  
3 legal conclusion, nor shall it operate as a waiver, nor affect any right, defense, claim or objection,  
4 including lack of jurisdiction and the right to seek arbitration of Plaintiff's claims.

5 *IT IS SO STIPULATED.*

6  
7 Dated this 31 day of October, 2023.

8  
9 **MORGAN, LEWIS & BOCKIUS LLP**

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21 *Attorneys for Defendant*

**ORDER**

IT IS SO ORDERED.

DATED: November 1, 2023.



THE HONORABLE JOHN H. CHUN  
UNITED STATES DISTRICT JUDGE

*Presented by:*

**MORGAN, LEWIS & BOCKIUS LLP**

By: s/ Amy P. Taylor

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SECOND STIPULATION AND ORDER EXTENDING  
DEFENDANT'S  
DEADLINE TO ANSWER OR RESPOND TO  
COMPLAINT - 3

(Case No. 2:23-cv-01430-JHC)

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